

Queuing Management: Solutions

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Status

- **Generic NOPR and IA / IP go a long way to addressing most important interconnection issues. Solutions are “evolutionary” not “revolutionary.”**
- **Large-scale resources and transmission owners have much more agreement than not.**
 - ANOPR, NOPR process has addressed and resolved many issues
- **Generation coming online and projects “in line” demonstrate that current problems are not endemic.**
- **Small-scale resources, and transmission and distribution owners have many unresolved and unaddressed issues**
 - Need more time
- **FERC should conduct some “queue management” of its own.**
 - “Everything at the same time” process is extremely difficult to manage.

Shared Needs Exist Around Investment Decisions

- Minimum risk/maximum certainty
- SMD will provide pricing signals to guide investment
- One queue promotes certainty
- RTOs should coordinate
- RTO planning and queuing process promotes fairness
- Realities of the network merit consideration
- Clear, uniform milestones and restudy provisions promote an efficient queue process
- Project developers want to know maximum cost exposure

Solution 1: The industry needs a single integrated interconnection queue

- **Multiple queues, multiple processes, need to be consolidated.**
- **FERC should mandate the industry to develop a “roadmap and timetable” for moving expeditiously from today’s environment toward regional queuing platforms.**
- **Easier said than done.**
 - Aggressive enforcement of reciprocity needed
 - All resources in one queue
 - Interregional coordination processes
 - Precise definitions of nature and scope of queues
 - Precise definition of “region”
 - Tighter milestones, restudy provisions
 - Separation of interconnection and delivery
 - Tightly managed efficient process

Solution 2: FERC must resolve small-scale resource interconnection issues

- **To protect reliability, FERC should ensure that various screens are based on minimum load criteria, not circuit design.**
 - “Islanding” must be avoided
 - Untested screening methods should be avoided
- **To the extent FERC addresses distribution level resources, it should defer to an RTO-defined limit respecting the engineering realities of the local network.**
- **FERC should avoid establishing ratepayer and shareholder subsidies for small-scale resources.**
 - Studies, interconnection costs, system upgrades, insurance
- **Information management must preserve confidentiality and national security.**
- **All resources should be included in the same queue.**
- **If possible, FERC and the states will need to address jurisdictional matters to ensure that regional and local exceptions, and variations are accommodated.**
- **Interconnection and delivery must remain separate services.**